

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

GEMAK TRUST,

Plaintiff,

v.

CHURCH & DWIGHT CO., INC.,

Defendant.

Civil Action No. 18-1854-RGA

**STIPULATION TO STAY ALL DEADLINES**

IT IS HEREBY STIPULATED AND AGREED between Plaintiff GEMAK Trust (“Plaintiff”) and Defendant Church & Dwight Co., Inc. (“Defendant”) that all deadlines in connection with the above-captioned lawsuit are stayed for a period of thirty days. The parties have reached an agreement in principal to resolve all claims asserted in this case and are in the process of finalizing that agreement. In light of the agreement and contemplated dismissal, the parties have stipulated to stay all deadlines in connection with this litigation for thirty days, up to and including January 12, 2021.

Dated: December 14, 2020

FISH & RICHARSON P.C.

POTTER ANDERSON & CORROON LLP

By: /s/ Kelly Allenspach Del Dotto  
Susan E. Morrison (#4690)  
Kelly Allenspach Del Dotto (#5969)  
Casey Kraning (#6298)  
222 Delaware Avenue, 17<sup>th</sup> Floor  
P.O. Box 1114  
Wilmington, DE 19899

By: /s/ Philip A. Rovner  
Philip A. Rovner (#3215)  
Jonathan A. Choa (#5319)  
Hercules Plaza  
P.O. Box 951  
Wilmington, DE 19899  
(302) 984-6000

Tel: (302) 652-5070  
morrison@fr.com  
kad@fr.com  
kraning@fr.com

John S. Goetz  
67 Times Square, 20th Floor  
New York, NY 10036  
Tel: (212) 641-2277  
goetz@fr.com

*Attorneys for Plaintiff GEMAK Trust*

provner@potteranderson.com  
jchoa@potteranderson.com

OF COUNSEL:

James H. Shalek  
Baldassare Vinti  
Colin Cabral  
PROSKAUER ROSE LLP  
11 Times Square  
New York, NY 10036-8299  
(212) 969-3000

*Attorneys for Defendant  
Church & Dwight Co., Inc.*

SO ORDERED this 14 day of December, 2020.

/s/ Richard G. Andrews

Honorable Richard G. Andrews